

4/16/2020

Seventh Circuit Court District-Docket Report

**Mississippi Electronic Courts  
Seventh Circuit Court District (Hinds Circuit Court - Jackson)  
CIVIL DOCKET FOR CASE #: 25CI1:20-cv-00079-WLK**

SUMMERS et al v. WILLIAMS et al  
Assigned to: Winston L Kidd

**Upcoming Settings:**

None Found

Date Filed: 02/04/2020  
Current Days Pending: 72  
Total Case Age: 72  
Jury Demand: None  
Nature of Suit: 41 Other Civil Rights

**Plaintiff**

**CASEY H SUMMERS**  
*INDIVIDUALLY, AND AS MOTHER AND  
NEXT FRIEND OF JASHANTI SUMMERS,  
AALIYAH ROBINSON, ANDRAS BRIDGES,  
JANARAYA SUMMERS, CAROLYN  
SUMMERS, AND JAKIYAH SUMMERS,  
ALL MINORS*

represented by **Ottowa E. Carter, Jr.**  
Ottowa E. Carter, Jr., P. A.  
Post Office Box 31  
CLINTON, MS 39060  
601-488-4471  
Fax: 601-488-4472  
Email: oec@ottowacarterlaw.com  
**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**HINDS COUNTY, MISSISSIPPI**

**Defendant**

**JOEL WILLIAMS**  
*INDIVIDUALLY AND IN THEIR  
OFFICIAL CAPACITIES AS DEPUTIES OF  
THE HINDS COUNTY SHERIFF'S  
DEPARTMENT*

**Defendant**

**JASON PITTMAN**  
*INDIVIDUALLY AND IN THEIR  
OFFICIAL CAPACITIES AS DEPUTIES OF  
THE HINDS COUNTY SHERIFF'S  
DEPARTMENT*

**Defendant**

**LOUIS HALL**  
*INDIVIDUALLY AND IN THEIR  
OFFICIAL CAPACITIES AS DEPUTIES OF  
THE HINDS COUNTY SHERIFF'S  
DEPARTMENT*

**Defendant**

**TONY TAYLOR**



4/16/2020

Seventh Circuit Court District-Docket Report

**INDIVIDUALLY AND IN THEIR  
OFFICIAL CAPACITIES AS DEPUTIES OF  
THE HINDS COUNTY SHERIFF'S  
DEPARTMENT**

**Defendant**

**JOHN DOES**

**1-10**

Date Filed	#	Docket Text
02/04/2020	<u>2</u>	COMPLAINT against LOUIS HALL, HINDS COUNTY, MISSISSIPPI, JASON PITTMAN, TONY TAYLOR, JOEL WILLIAMS, filed by CASEY H SUMMERS. (Attachments: # <u>1</u> Civil Cover Sheet,) (KC) (Entered: 02/04/2020)
02/04/2020	<u>3</u>	SUMMONS Issued to HINDS COUNTY, MISSISSIPPI. (KC) (Entered: 02/04/2020)
02/04/2020	<u>4</u>	SUMMONS Issued to TONY TAYLOR. (KC) (Main Document 4 replaced on 2/4/2020) (KC). (Entered: 02/04/2020)
02/04/2020	<u>5</u>	SUMMONS Issued to JASON PITTMAN. (KC) . (Entered: 02/04/2020)
02/04/2020	<u>6</u>	SUMMONS Issued to LOUIS HALL. (KC) (Entered: 02/04/2020)
02/04/2020	<u>7</u>	SUMMONS Issued to JOEL WILLIAMS. (KC) (Entered: 02/04/2020)
03/27/2020	<u>8</u>	SUMMONS Returned Executed by CASEY H SUMMERS. <b>Re: ** <u>3</u> SUMMONS Issued to HINDS COUNTY, MISSISSIPPI. (KC)** HINDS COUNTY, MISSISSIPPI served on 3/19/2020, answer due 4/18/2020. Service type: Personal (Carter, Ottawa) (Entered: 03/27/2020)</b>
04/07/2020	<u>9</u>	SUMMONS Returned Executed by CASEY H SUMMERS. <b>Re: ** <u>7</u> SUMMONS Issued to JOEL WILLIAMS. (KC)** JOEL WILLIAMS served on 3/20/2020, answer due 4/19/2020. Service type: Personal (Carter, Ottawa) (Entered: 04/07/2020)</b>

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04/16/2020 11:41:54			
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MEC Login:	sl0205	Client Code:	
Description:	Docket Report	Search Criteria:	25C11:20-cv-00079-WLK
Billable Pages:	1	Cost:	0.20

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI**

**CASEY H. SUMMERS, INDIVIDUALLY, and  
as Mother and Next Friend of JASHANTI  
SUMMERS, AALIYAH ROBINSON, ANDRAS  
BRIDGES, JANARAYA SUMMERS, CAROLYN  
SUMMERS, and JAKIYAH SUMMERS, all Minors**

**PLAINTIFFS**

**v.**

**CAUSE NO.**

20-79

**HINDS COUNTY, MISSISSIPPI,  
JOEL WILLIAMS, JASON PITTMAN,  
LOUIS HALL, AND TONY TAYLOR ,  
INDIVIDUALLY, and IN THEIR OFFICIAL  
CAPACITIES as DEPUTIES OF THE  
HINDS COUNTY SHERIFF'S DEPARTMENT,  
and JOHN DOES 1-10**

**DEFENDANTS**

**COMPLAINT  
(Jury Trial Demanded)**

The Plaintiffs, Casey H. Summers, Individually, and as Mother and Next Friend of Jashanti Summers, AAliyah Robinson, Andras Bridges, Janaraya Summers, Carolyn Summers, and Jakiyah Summers, all Minors, file their complaint against Hinds County, Mississippi, Joel Williams, Jason Pittman, Louis Hall, and Tony Taylor, individually and in their official capacities as Deputies of the Hinds County Sheriff's Department, and John Does 1-10. This action is brought pursuant to 42 U. S. C. §§ 1983 and 1988(b), and the Fourth, Fifth and Fourteenth Amendments to the United States Constitution, stating as follows:

**I.  
THE PARTIES**

1. Plaintiff Casey H. Summers (Casey) is an adult female resident citizen of Hinds County, Mississippi, residing in Jackson, Mississippi. Casey is the natural mother and

next friend of her minor children, Jashanti Summers (Jashanti), AAliyah Robinson (AAliyah), Andras Bridges (Andras), Janaraya Summers (Janaraya), Carolyn Summers (Carolyn), and Jakiyah Summers (Jakiyah), all minors. The minor children are resident citizens of Hinds County, Mississippi, residing with their mother, Casey, in Jackson, Mississippi.

2. Defendant, Hinds County, Mississippi (“the County” or “Hinds County”), is a political subdivision organized and existing under the laws of the State of Mississippi. Hinds County can be served with the process of this court by service upon the President of the Hinds County Board of Supervisors, the Honorable Robert Graham, at his business address, 316 S. President Street, Jackson, Mississippi 39201.

3. Defendant Joel Williams (“Williams” or “Deputy Williams”) is a resident citizen of Hinds County. He is a law enforcement officer employed with The Hinds County Sheriff’s Department (“HCSD”) who was acting within the course and scope of his employment when the actions complained of occurred. Deputy Williams is sued individually and in his official capacity as a deputy with the HCSD. He can be served with the process of this court by service upon him at his place of employment, the HCSD, 407 E. Pascagoula Street, Jackson, MS 39201, 1450 County Farm Road, Raymond, Mississippi 39154 or wherever he can be found.

4. Defendant Jason Pittman (“Pittman” or “Deputy Pittman”) is a resident citizen of Hinds County. He is a law enforcement officer employed with the HCSD who was acting within the course and scope of his employment when the actions complained of occurred. Deputy Pittman is sued individually and in his official capacity as a deputy with the HCSD. He can be served with the process of this court

by service upon him at his place of employment, the HCSD, 407 E. Pascagoula Street, Jackson, MS 39201, 1450 County Farm Road, Raymond, Mississippi 39154 or wherever he can be found.

5. Defendant Louis Hall ("Hall" or "Deputy Hall") is a resident citizen of Hinds County. He is a law enforcement officer employed with the HCSD who was acting within the course and scope of his employment when the actions complained of occurred. Deputy Hall is sued individually and in his official capacity as a deputy with the HCSD. He can be served with the process of this court by service upon him at his place of employment, the HCSD, 407 E. Pascagoula Street, Jackson, MS 39201, 1450 County Farm Road, Raymond, Mississippi 39154 or wherever he can be found.

6. Defendant Tony Taylor ("Taylor" or "Deputy Taylor") is a resident citizen of Hinds County. He is a law enforcement officer employed with the HCSD who was acting within the course and scope of his employment when the actions complained of occurred. Deputy Taylor is sued individually and in his official capacity as a deputy with the HCSD. He can be served with the process of this court by service upon him at his place of employment, the HCSD, 407 E. Pascagoula Street, Jackson, MS 39201, 1450 County Farm Road, Raymond, Mississippi 39154 or wherever he can be found.

7. John Doe Defendants 1-10 are unidentified and unknown Defendants whose actions caused or contributed to the injuries and damages complained of herein. These Defendants will be substituted by amendment of the pleadings when they are identified through discovery or otherwise.

27. At all times relevant, the Plaintiffs were not intoxicated, belligerent, disorderly, or a threat to the Deputies' safety, the Plaintiffs' safety, or the safety of anyone else. The Deputies' unlawful, unreasonable, unnecessary, and excessive use of force was unrelated to their efforts to arrest Jonathan.

28. At all times relevant, there were no warrants for Plaintiffs' arrests, probable cause for their arrests, or legal cause or excuse to seize their persons. The Deputies' actions were reckless, grossly negligent and indifferent toward Plaintiffs and an unlawful, unreasonable, unnecessary, and excessive use of force.

29. At all times relevant, the Deputies were duly appointed and acting officers of the HCSD, acting under color of the United States Constitution, Mississippi Constitution, statutes, ordinances, regulations, policies, customs and usages and authority of their offices as Deputies with the HCSD.

30. As a direct and proximate result of the Deputies' actions, Plaintiffs suffered past and future physical and emotional trauma, physical pain and suffering, mental anguish, aggravation, loss of enjoyment of life, and past and future medical expenses.

#### **IV. CAUSES OF ACTION**

##### **COUNT I - 42 U. S. C. § 1983 – THE DEPUTIES' LIABILITY**

31. The allegations of the preceding paragraphs are incorporated herein by reference as if set forth in full herein.

32. The Deputies' seizure and unreasonable and excessive use of deadly force violated the Plaintiffs' rights under the Fourth, Fifth and Fourteenth Amendments to the United States Constitution.

## II JURISDICTION AND VENUE

8. The allegations of the preceding paragraphs are incorporated herein by reference as if set forth in full herein.

9. Jurisdiction is proper in this court since this action arises under the Constitution and laws of the United States of America, including 42 U. S. C. § 1983. This court has concurrent jurisdiction with federal courts to hear this action.

10. Venue is proper since one or all of the Defendants reside in this judicial district and the actions complained of occurred in this judicial district.

## III. THE FACTS

11. On May 17, 2018, Jonathan Summers' (Jonathan) aunt, Gloria Brister, called him on his cell phone and told him the police were at his home in Raymond, Mississippi. Although the officers refused to tell her why they were there, Jonathan told her he was coming home. Apparently, they these officers were there to serve Jonathan with active misdemeanor warrants and a felony warrant for fleeing/alluding.

12. Jonathan had just left the Dollar General Store on Siwell Road in Jackson, Mississippi and turned west onto Hwy 18 driving towards his home in Raymond. His wife, Plaintiff Casey Summers, and their six (6) children whose ages ranged from six (6) months to twelve (12) years, were with him. Deputy Pittman spotted Jonathan's car and transmitted this information to Deputy Williams. Shortly thereafter, Deputy Williams saw the car and trailed Jonathan for a brief period. He then initiated a traffic stop by turning on his blue lights along with other deputies who had arrived on the scene.

13. Complying with Deputy Williams' commands, Jonathan turned left and



crossed Hwy 18 to the firecracker store on the south side of the highway facing east. Jonathan then stopped and turned the engine off when the deputies told him to. Deputy Pittman pulled alongside Jonathan on the driver's side, Deputy Hall parked on the passenger side, and Deputy Williams parked at Jonathan's rear. Deputy Taylor was the last to arrive on the scene and parked his vehicle somewhat in front of Jonathan's car, but not totally blocking it.

14. Deputies Williams, Pittman, Hall, and Jackson (collectively "Deputies") exited their vehicles with guns drawn yelling for Jonathan to raise his hands and not move. Andras, Jonathan's son, heard at least one of the Deputies say "hold your fire – kids are in the car." Jonathan held his hands high and asked "what did I do?" Deputy Williams replied, "you know what it is." Jonathan asked Deputy Williams if he could give his wife a kiss before exiting the car. Deputy Williams did not respond. While still holding his hands high, Jonathan moved his head to his right to give his wife a good-bye kiss before going to jail.

15. As Jonathan sat in the car with Casey and their six children with his hands held high over his head, he had no gun, had not threatened the Deputies, and he had taken no action that could have been perceived as presenting a danger to the Deputies. The Deputies also knew where Jonathan lived as they had just left his home shortly before they stopped him.

16. When Jonathan moved his head to kiss Casey goodbye with his hands still held high, suddenly and without provocation, Deputies Pittman and Hall shot into the car two or three times. This use of deadly force was unlawful, unreasonable, unnecessary and excessive since Jonathan had taken no action that could have been perceived as



resisting arrest.

17. The bullets passed by Jonathan's head and through the windshield. Fearing for his life, and the lives of his wife and six children, Jonathan instinctively turned on the car and drove around the police car in front of him, slightly touching it. He sped onto Highway 18 headed east seeking the safety of his brother's home on Larchmont Street in Jackson, Mississippi.

18. When Jonathan sped away from the gunfire, none of the Deputies were in front of the car or in any danger of being hit by the car. Deputies Pittman and Hall immediately got into their vehicles and began to chase Jonathan. Deputy Williams joined in the chase shortly thereafter. On information and belief, Deputy Taylor joined in the chase as well.

19. As Jonathan attempted to escape the shooting, the Deputies fired more shots at and into his car. Jonathan had no choice but to drive down Hwy 18 at a high rate of speed to escape the terror of the Deputies' shooting while in hot pursuit. Unfortunately, he ran a red light at the intersection of Highway 18 and Mattox Road. A black 2007 Nissan Titan pick-up truck came into the intersection at the same time and Jonathan hit the truck.

20. Jonathan's car caught fire and burned. As a result of this collision, six month old Jakiyah, was taken to CMMC's Emergency Room where she was stabilized and then airlifted to UMMC. The Deputies arrested Jonathan at the scene. He was charged with (a) felony fleeing; (b) aggravated assault; and (c) 6 counts of child endangerment.

21. These charges were made against Jonathan with the specific intent to cover up the Deputies' unlawful, unreasonable, unnecessary, and excessive use of force.

22. As a result of the Deputies' actions, the Plaintiffs suffered numerous serious physical, mental and emotional injuries. Although some of the children fortuitously escaped physical injury, all of them suffered psychological pain, injuries and disabilities resulting from the Deputies' unlawful, unreasonable, unnecessary, and excessive use of deadly force in shooting into the car and chasing them and the resulting car crash.

23. One of the bullets grazed Casey's right shoulder which required stitching and shattered glass left permanent scarring. The femur in her right leg was broken and ligaments in her right knee were torn. Casey underwent surgery and a metal rod was implanted in her right leg that extends from her hip to her knee.

24. Jashanti was age 4 at the time and glass penetrated the skin of her stomach and scars remain. Aaliyah, age 10 at the time, suffered two fractured fingers on her left hand; Andras, age 9 at the time, suffered a concussion, a fractured wrist, and a scar from a bullet that grazed his neck; Janaraya, age 5 at the time, suffered painful stomach cramps; and Carolyn, age 3 at the time, suffered scratches to her body.

25. Jakiyah, age 6 months at the time, was hospitalized at the UMMC for approximately 2 ½ months. She was in its ICU for approximately 3 weeks, suffering with bleeding on the brain. Initially, Jakiyah's doctors told Casey she was not going to make it through the night. She continues to receive physical & occupational therapy and monitoring of her brain activity. The full extent of her injuries is unknown. However, she is not crawling, sitting up by herself, rolling over, or holding her head up as expected of a child her age.

26. The Plaintiffs' physical, mental and emotional injuries were the result of the Deputies' unlawful, unreasonable, unnecessary, and excessive use of force against them.

33. The Deputies use of deadly and excessive force was objectively unreasonable in light of the facts and circumstances confronting them. Such actions violated the Plaintiffs' rights under the Fourth Amendment of the United States Constitution.

34. The Deputies' use of unlawful, unreasonable, unnecessary, and excessive and deadly use of force when neither Jonathan nor anyone else in the car were armed and presented no threat to them, showed a callous disregard for the Plaintiffs' rights. Their actions were arbitrary, shock the conscience and interfere with rights implicit in ordered liberty. Thus, the Deputies' actions violated the Plaintiffs' rights under the Fifth Amendment of the United States Constitution.

35. The Deputies' unlawful, unreasonable, unnecessary, and excessive use of deadly force caused the Plaintiffs to suffer physical, mental and emotional injuries. Their actions were grossly disproportionate to the need for action under the circumstances and were inspired by malice rather than merely careless or unwise excess of zeal. Such actions amounted to an abuse of official power that shock the conscience and deprived the Plaintiffs of their liberty without due process of law. Such actions violated the Plaintiffs' rights under the Fourteenth Amendment of the United States Constitution.

36. The Deputies' actions violated the following clearly established and well settled Federal Constitutional rights of the Plaintiffs' under the Fourth, Fifth and Fourteenth Amendments to the United States Constitution to be free from: (a) unreasonable searches and seizures; (b) deprivation of their liberty without due process of law; (c) the use of excessive, unreasonable and unjustified force; and (d) arbitrary government actions which are so outrageous as to shock the conscience of a

civilized society.

37. Based on the above, Plaintiffs are entitled to recover compensatory and punitive damages pursuant to 42 U. S. C. § 1983 for the injuries they suffered and continue to suffer for the Deputies' violations of their Constitutional rights under color of law. Plaintiffs are entitled to recover punitive damages because the Deputies' actions were done maliciously, willfully, wantonly and/or in reckless disregard for their Constitutional rights. Plaintiffs are also entitled to an award of attorneys' fees pursuant to 42 U. S. C. § 1988.

**COUNT II - 42 U. S. C. § 1983 - HINDS COUNTY'S LIABILITY**

38. The allegations of the preceding paragraphs are incorporated herein by reference as if set forth in full herein.

39. The Constitutional violations and injuries suffered by the Plaintiffs were caused directly and proximately by customs, policies and practices of the County, the HCSD, and the Hinds County Sheriff when the incident occurred, Victor Mason. Sheriff Mason knew about the wrongdoing of Deputies Williams, Pittman, Hall, Jackson and other members of the HCSD.

40. As the top HCSD's law enforcement officer and chief policymaker, Sheriff Mason had the power, authority, and duty to prevent the actions set forth in the Complaint. Sheriff Mason refused to do so in violation of 42 U. S. C. § 1983.

41. It was the policy and/or custom of the County and HCSD to inadequately and improperly investigate law enforcement misconduct and to cover up such misconduct, including the Deputies' conduct in this case. Such acts of misconduct by its officers were tolerated by the County and the HCSD, including but not limited to the

following:

- a. using excessive and unreasonable force in arresting individuals;
- b. charging individuals falsely to cover up their illegal conduct; and
- c. causing individuals to be prosecuted on false charges as a shield from liability.

42. It was the policy and custom of the County and the HCSD to inadequately supervise and train its police officers, including Deputies Williams, Pittman, Hall, and Jackson, thereby failing to adequately discourage further Constitutional violations on the part of its law enforcement officers, with such policies including, but not limited to the following:

- a. Failure to implement a uniform policy with respect to seizures, arrests, and the proper use of force in deliberate indifference and reckless disregard for the welfare of the public at large, including the Plaintiffs;
- b. Failure to adequately train law enforcement personnel with respect to seizures, arrests, and the proper use of force in deliberate indifference and reckless disregard for the welfare of the public at large, including the Plaintiffs; and
- c. Failure to adequately supervise the officers in deliberate indifference and reckless disregard for the welfare of the public at large, including the Plaintiffs.

43. As a result of these policies and customs, officers of the HCSD, including Deputies Williams, Pittman, Hall and Jackson, believed their actions would not be properly monitored, investigated or sanctioned by supervisory officers and that such misconduct would be tolerated.

44. The indifference of the Hinds County policymakers and the HCSD to the

Constitutional rights of persons within Hinds County along with its customs and policies were the causes of the violations of the Plaintiffs' rights as alleged herein.

45. The above-described policies and customs demonstrated a deliberate indifference to the Constitutional rights of the Plaintiffs and Hind County citizens.

**COUNT III - 42 U. S. C. § 1983 - HINDS COUNTY'S RATIFICATION**

46. The allegations of the preceding paragraphs are incorporated herein by reference as if set forth in full herein.

47. Sheriff Mason, or authorized subordinate(s), approved the unconstitutional decisions and actions of the Deputies unlawful, unreasonable, unnecessary, and excessive use of force upon the Plaintiffs, along with the basis for their decisions.

48. Sheriff Mason, or authorized subordinate(s), approved of the Deputies' actions even though he knew they were committed in the extreme factual situation of the Deputies shooting at a nonmoving car with six helpless children, their mother, and Jonathan inside. The Deputies continued to shoot despite the fact that Jonathan made no attempt to escape or resist arrest.

49. Sheriff Mason also knew the Deputies continued their outrageous and illegal conduct by chasing the Plaintiffs when Jonathan was forced to escape the onslaught of bullets to save the lives of his wife and children, and his own.

50. Such approval by the HCSD's Chief policymaker, ratified the Deputies' actions. Therefore, Hinds County is liable to the Plaintiffs under the theory of ratification.

**IV.  
PRAYER FOR RELIEF**

49. That the allegations of the preceding paragraphs are incorporated herein

by reference as if set forth in full herein.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiffs demand judgment of and from Hinds County, Mississippi, Deputies Williams, Pittman, Hall and Jackson, both jointly and severally, for compensatory and punitive damages, including, but not limited to, the following:

- a. Past, present, and future physical pain and suffering;
- b. Past, present, and future emotional pain and suffering;
- c. Loss of enjoyment of life;
- d. Past, present, and future medical expenses;
- e. Costs, expenses, and attorneys' fees;
- f. Pre and post judgment interest; and
- g. Such other, further and different relief to which they may be entitled.

**RESPECTFULLY SUBMITTED,** this 3rd day of February, 2020.

**CASEY H. SUMMERS, INDIVIDUALLY,  
and as Mother and Next Friend of JASHANTI  
SUMMERS, AALIYAH ROBINSON,  
ANDRAS BRIDGES, JANARAYA WUMMERS,  
CAROLYN SUMMERS, and JAKIYAH  
SUMMERS, all Minors, PLAINTIFFS**

BY:

  
Ottawa E. Carter Jr., MSB#8926,  
Their Attorney



**OF COUNSEL:**

**OTTOWA E. CARTER, JR., P.A.**  
**604 Hwy 80 W., Suite N (39056)**  
**P. O. Box 31**  
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**Tel: (601) 488-4471**  
**Fax: (601) 488-4472**  
**Email: [eec@ottowacarterlaw.com](mailto:eec@ottowacarterlaw.com)**

<b>COVER SHEET</b> Case: 25CI120-cv-00019-1 <b>Civil Case Filing Form</b> (To be completed by Attorney/Party Prior to Filing of Pleading)		Court Identification Docket # <div style="border: 1px solid black; padding: 2px; display: inline-block;">           25 11 11         </div>		Case Year <div style="border: 1px solid black; padding: 2px; display: inline-block;">           2020         </div>	Docket Number <div style="border: 1px solid black; padding: 2px; display: inline-block;">           Page 1 of 9         </div>
Mississippi Supreme Court Administrative Office of Courts		Form AOC/01 (Rev 2016)		This area to be completed by clerk	
In the CIRCUIT <input checked="" type="checkbox"/>		Court of <u>HINDS</u>		County — <u>FIRST</u> <input checked="" type="checkbox"/> Judicial District	
<b>Origin of Suit (Place an "X" in one box only)</b>					
<input checked="" type="checkbox"/> Initial Filing <input type="checkbox"/> Reinstated <input type="checkbox"/> Foreign Judgment Enrolled <input type="checkbox"/> Transfer from Other court <input type="checkbox"/> Other <input type="checkbox"/> Remanded <input type="checkbox"/> Reopened <input type="checkbox"/> Joining Suit/Action <input type="checkbox"/> Appeal					
<b>Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form</b>					
<b>Individual</b> <u>Summers</u> <u>Casey</u> <u>Hutton</u> <div style="display: flex; justify-content: space-between;"> <span>Last Name</span> <span>First Name</span> <span>Maiden Name, if applicable</span> <span>M.I.</span> <span>Jr/Sr/III/IV</span> </div>					
<input type="checkbox"/> Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____ <input type="checkbox"/> Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____					
<b>Business</b> _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated <input type="checkbox"/> Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: D/B/A _____					
<b>Address of Plaintiff</b> <u>732 Evergreen Street, Jackson, MS 39204</u>					
<b>Attorney (Name &amp; Address)</b> <u>604 Hwy 80 W, Sutie N., P. O. Box 31, Clinton, MS 39060</u> <b>MS Bar No.</b> <u>8925</u>					
<input type="checkbox"/> Check (x) if Individual Filing Initial Pleading is NOT an attorney <b>Signature of Individual Filing:</b> <i>[Signature]</i>					
<b>Defendant - Name of Defendant - Enter Additional Defendants on Separate Form</b>					
<b>Individual</b> _____ <div style="display: flex; justify-content: space-between;"> <span>Last Name</span> <span>First Name</span> <span>Maiden Name, if applicable</span> <span>M.I.</span> <span>Jr/Sr/III/IV</span> </div>					
<input type="checkbox"/> Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____ <input type="checkbox"/> Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____					
<b>Business</b> <u>Hinds County, Mississippi (Sheriff's Department)</u> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated <input type="checkbox"/> Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: D/B/A _____					
<b>Attorney (Name &amp; Address) - If Known</b> _____ <b>MS Bar No.</b> _____					
<input type="checkbox"/> Check (x) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet					
<b>Nature of Suit (Place an "X" in one box only)</b>					
<b>Domestic Relations</b> <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Term. of Parental Rights-Chancery <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____		<b>Business/Commercial</b> <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____		<b>Children/Minors - Non-Domestic</b> <input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion <input type="checkbox"/> Minor Removal of Minority <input type="checkbox"/> Other _____	
<b>Appeals</b> <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Municipal Court <input type="checkbox"/> Other _____		<b>Probate</b> <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Mental Health Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Alcohol/Drug Commitment (Involuntary)		<b>Civil Rights</b> <input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input checked="" type="checkbox"/> Other <u>Civil Rights violation</u>	
		<b>Contract</b> <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____		<b>Real Property</b> <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____	
		<b>Statutes/Rules</b> <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____		<b>Torts</b> <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Intentional Tort <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____	

Case: 25CL-20-CV-00079-1 COURT OF WINDS: 2-1 Filed: 02/04/2011 Page 12 of 3

FIRST ☒ JUDICIAL DISTRICT, CITY OF \_\_\_\_\_Docket No. \_\_\_\_\_ - \_\_\_\_\_  
File Yr \_\_\_\_\_ Chronological No. \_\_\_\_\_ Clerk's Local ID \_\_\_\_\_Docket No. If Filed \_\_\_\_\_  
Prior to 1/1/94 \_\_\_\_\_DEFENDANTS IN REFERENCED CAUSE - Page 1 of \_\_\_\_ Defendants Pages  
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

## Defendant #2:

Individual: Williams Last Name Joel First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_ Not an Attorney(✓) \_\_\_\_

## Defendant #3:

Individual: Pittman Last Name Jason First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_ Not an Attorney(✓) \_\_\_\_

## Defendant #4:

Individual: Hall Last Name Louis First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_ Not an Attorney(✓) \_\_\_\_

Case 2:20-cv-00079-1-1 Filed 02/04/20 Page 3 of 3  
IN THE CIRCUIT COURT OF HONORS 2-1 Filed 02/04/20 Page 3 of 3

FIRST

☒ JUDICIAL DISTRICT, CITY OFDocket No. \_\_\_\_\_ - \_\_\_\_\_  
File Yr Chronological No. Clerk's Local IDDocket No. If Filed  
Prior to 1/1/94 \_\_\_\_\_DEFENDANTS IN REFERENCED CAUSE - Page \_\_\_\_ of \_\_\_\_ Defendants Pages  
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEETDefendant # 5 :Individual: Taylor Tony \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Defendant # \_\_\_\_ :

Individual: \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Defendant # \_\_\_\_ :

Individual: \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI**

**CASEY H. SUMMERS, INDIVIDUALLY, and  
as Mother and Next Friend of JASHANTI  
SUMMERS, AALIYAH ROBINSON, ANDRAS  
BRIDGES, JANARAYA SUMMERS, CAROLYN  
SUMMERS, and JAKIYAH SUMMERS, all Minors**

**PLAINTIFFS**

**v.**

**CAUSE NO.**

**21-79**

**HINDS COUNTY, MISSISSIPPI,  
JOEL WILLIAMS, JASON PITTMAN,  
LOUIS HALL, AND TONY TAYLOR ,  
INDIVIDUALLY, and IN THEIR OFFICIAL  
CAPACITIES as DEPUTIES OF THE  
HINDS COUNTY SHERIFF'S DEPARTMENT,  
and JOHN DOES 1-10**

**DEFENDANTS**

**SUMMONS**

**THE STATE OF MISSISSIPPI**

**TO: Hinds County, Mississippi**  
c/o The Honorable Robert Graham  
316 S. President Street  
Jackson, Mississippi 39201

**NOTICE TO DEFENDANT(S)**

**THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU  
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.**

You are required to mail or hand-deliver a copy of a written response to the Complaint to Ottawa E. Carter, Jr., attorney for the Plaintiff, whose addresses are 604 Hwy 80 W., Suite N, Clinton, MS 39056, or P. O. Box 31, Clinton, MS 39060.

Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the Complaint. Your response to the attached Plaintiff's First Set of Interrogatories and First Set of Requests for Production of Documents and Things must be mailed or delivered to the attorney for Plaintiff within forty-five (45) days from the date of delivery.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

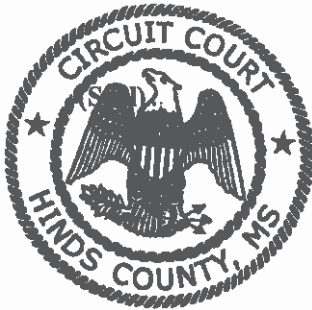
Case: 25CI1:20-cv-00079-WLK Document #: 3 Filed: 02/04/2020 Page 2 of 3

Issued under my hand and the seal of said Court, this the \_\_\_\_ day of February, 2020.

ZACK WALLACE, CIRCUIT CLERK

HINDS COUNTY, MISSISSIPPI

BY:                     , D.C.







Case: 25CI1:20-cv-00079-WLK Document #: 4 Filed: 02/04/2020 Page 1 of 3

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI**

**CASEY H. SUMMERS, INDIVIDUALLY, and  
as Mother and Next Friend of JASHANTI  
SUMMERS, AALIYAH ROBINSON, ANDRAS  
BRIDGES, JANARAYA SUMMERS, CAROLYN  
SUMMERS, and JAKIYAH SUMMERS, all Minors**

**PLAINTIFFS**

**v.**

**CAUSE NO.**

**20-79**

**HINDS COUNTY, MISSISSIPPI,  
JOEL WILLIAMS, JASON PITTMAN,  
LOUIS HALL, AND TONY TAYLOR ,  
INDIVIDUALLY, and IN THEIR OFFICIAL  
CAPACITIES as DEPUTIES OF THE  
HINDS COUNTY SHERIFF'S DEPARTMENT,  
and JOHN DOES 1-10**

**DEFENDANTS**

**SUMMONS**

**THE STATE OF MISSISSIPPI**

**TO: Tony Taylor**

Hinds County Sheriff's Department  
407 E. Pascagoula Street  
Jackson, Mississippi 39201

**NOTICE TO DEFENDANT(S)**

**THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU  
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.**

You are required to mail or hand-deliver a copy of a written response to the Complaint to Ottawa E. Carter, Jr., attorney for the Plaintiff, whose addresses are 604 Hwy 80 W., Suite N, Clinton, MS 39056, or P. O. Box 31, Clinton, MS 39060.

Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the Complaint. Your response to the attached Plaintiff's First Set of Interrogatories and First Set of Requests for Production of Documents and Things must be mailed or delivered to the attorney for Plaintiff within forty-five (45) days from the date of delivery.

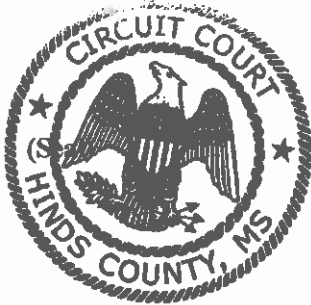
You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

. Case: 25CI1:20-cv-00079-WLK Document #: 4 Filed: 02/04/2020 Page 2 of 3

Issued under my hand and the seal of said Court, this the 4 day of February, 2020.

ZACK WALLACE, CIRCUIT CLERK

HINDS COUNTY, MISSISSIPPI



BY: , D.C.



**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI**

**CASEY H. SUMMERS, INDIVIDUALLY, and  
as Mother and Next Friend of JASHANTI  
SUMMERS, AALIYAH ROBINSON, ANDRAS  
BRIDGES, JANARAYA SUMMERS, CAROLYN  
SUMMERS, and JAKIYAH SUMMERS, all Minors**

**PLAINTIFFS**

**v.**

**CAUSE NO.**

20-79

**HINDS COUNTY, MISSISSIPPI,  
JOEL WILLIAMS, JASON PITTMAN,  
LOUIS HALL, AND TONY TAYLOR ,  
INDIVIDUALLY, and IN THEIR OFFICIAL  
CAPACITIES as DEPUTIES OF THE  
HINDS COUNTY SHERIFF'S DEPARTMENT,  
and JOHN DOES 1-10**

**DEFENDANTS**

**SUMMONS**

**THE STATE OF MISSISSIPPI**

**TO: Jason Pittman**

Hinds County Sheriff's Department  
407 E. Pascagoula Street  
Jackson, Mississippi 39201

**NOTICE TO DEFENDANT(S)**

**THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU  
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.**

You are required to mail or hand-deliver a copy of a written response to the Complaint to Ottawa E. Carter, Jr., attorney for the Plaintiff, whose addresses are 604 Hwy 80 W., Suite N, Clinton, MS 39056, or P. O. Box 31, Clinton, MS 39060.

Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the Complaint. Your response to the attached Plaintiff's First Set of Interrogatories and First Set of Requests for Production of Documents and Things must be mailed or delivered to the attorney for Plaintiff within forty-five (45) days from the date of delivery.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

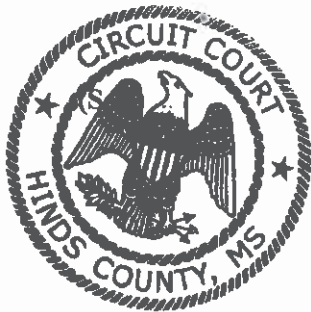
Case: 25C11:20-cv-00079-WLK Document 1-1 Filed: 02/04/2020 Page 2 of 3

Issued under my hand and the seal of said Court, this the \_\_\_\_ day of February, 2020.

**ZACK WALLACE, CIRCUIT CLERK**

**HINDS COUNTY, MISSISSIPPI**

BY:             , D.C.



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Case: 25CI1:20-cv-00079-WLK Document #: 6 Filed: 02/04/2020 Page 1 of 3

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI**

**CASEY H. SUMMERS, INDIVIDUALLY, and  
as Mother and Next Friend of JASHANTI  
SUMMERS, AALIYAH ROBINSON, ANDRAS  
BRIDGES, JANARAYA SUMMERS, CAROLYN  
SUMMERS, and JAKIYAH SUMMERS, all Minors**

**PLAINTIFFS**

**v.**

**CAUSE NO.**

2079

**HINDS COUNTY, MISSISSIPPI,  
JOEL WILLIAMS, JASON PITTMAN,  
LOUIS HALL, AND TONY TAYLOR,  
INDIVIDUALLY, and IN THEIR OFFICIAL  
CAPACITIES as DEPUTIES OF THE  
HINDS COUNTY SHERIFF'S DEPARTMENT,  
and JOHN DOES 1-10**

**DEFENDANTS**

**SUMMONS**

**THE STATE OF MISSISSIPPI**

**TO: Louis Hall**

Hinds County Sheriff's Department  
407 E. Pascagoula Street  
Jackson, Mississippi 39201

**NOTICE TO DEFENDANT(S)**

**THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU  
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.**

You are required to mail or hand-deliver a copy of a written response to the Complaint to Ottawa E. Carter, Jr., attorney for the Plaintiff, whose addresses are 604 Hwy 80 W., Suite N, Clinton, MS 39056, or P. O. Box 31, Clinton, MS 39060.

Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the Complaint. Your response to the attached Plaintiff's First Set of Interrogatories and First Set of Requests for Production of Documents and Things must be mailed or delivered to the attorney for Plaintiff within forty-five (45) days from the date of delivery.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.



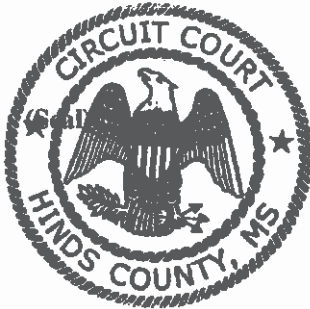
Case: 25CI1:20-cv-00079-WLK Document #: 6 Filed: 02/04/2020 Page 2 of 3

Issued under my hand and the seal of said Court, this the \_\_\_\_ day of February, 2020.

**ZACK WALLACE, CIRCUIT CLERK**

**FORREST COUNTY, MISSISSIPPI**

BY:                     W                    , D.C.



Louis Hall

**PROOF OF SERVICE-SUMMONS**  
(Process Server)

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used);

\_\_\_\_ FIRST CLASS MAIL AND ACKNOWLEDGMENT OF SERVICE. By mailing (by first class mail, postage prepaid), on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender (*Attach completed acknowledgment of receipt pursuant to M.R.C.P. Form 1B*).

\_\_\_\_ PERSONAL SERVICE. I personally delivered copies to \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 2020, where I found said person(s) in \_\_\_\_\_ County of the State of Mississippi.

\_\_\_\_ RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said person within \_\_\_\_\_ County, Mississippi. I served the summons and complaint on the \_\_\_\_\_ day of \_\_\_\_\_, 2020, at the usual place of abode of said person by leaving a true copy of the summons and complaint with \_\_\_\_\_ who is the \_\_\_\_\_ (here insert wife, husband, son, daughter or other person as the case may be), a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, 2020 I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

\_\_\_\_ CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (*Attach signed return receipt or the return envelope marked "Refused"*.)

At the time of service I was at least 18 years of age and not a party to this action.

FEE FOR SERVICE: \$ \_\_\_\_\_

Process server must list below:

Name \_\_\_\_\_

Address \_\_\_\_\_

Telephone No. \_\_\_\_\_

State of Mississippi

County of \_\_\_\_\_

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named \_\_\_\_\_ who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

\_\_\_\_\_  
PROCESS SERVER SIGN HERE

Sworn to and subscribed before me, this the \_\_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI**

**CASEY H. SUMMERS, INDIVIDUALLY, and  
as Mother and Next Friend of JASHANTI  
SUMMERS, AALIYAH ROBINSON, ANDRAS  
BRIDGES, JANARAYA SUMMERS, CAROLYN  
SUMMERS, and JAKIYAH SUMMERS, all Minors**

**PLAINTIFFS**

**v.**

**CAUSE NO.**

20-79

**HINDS COUNTY, MISSISSIPPI,  
JOEL WILLIAMS, JASON PITTMAN,  
LOUIS HALL, AND TONY TAYLOR ,  
INDIVIDUALLY, and IN THEIR OFFICIAL  
CAPACITIES as DEPUTIES OF THE  
HINDS COUNTY SHERIFF'S DEPARTMENT,  
and JOHN DOES 1-10**

**DEFENDANTS**

**SUMMONS**

**THE STATE OF MISSISSIPPI**

**TO: Joel Williams**

Hinds County Sheriff's Department  
407 E. Pascagoula Street  
Jackson, Mississippi 39201

**NOTICE TO DEFENDANT(S)**

**THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU  
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.**

You are required to mail or hand-deliver a copy of a written response to the Complaint to Ottawa E. Carter, Jr., attorney for the Plaintiff, whose addresses are 604 Hwy 80 W., Suite N, Clinton, MS 39056, or P. O. Box 31, Clinton, MS 39060.

Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the Complaint. Your response to the attached Plaintiff's First Set of Interrogatories and First Set of Requests for Production of Documents and Things must be mailed or delivered to the attorney for Plaintiff within forty-five (45) days from the date of delivery.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

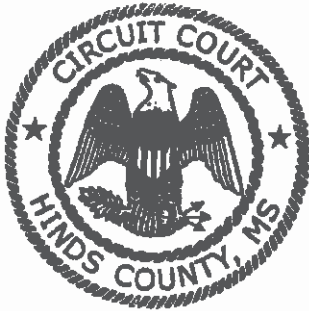
Case: 25CI1:20-cv-00079-WLK Document #: 7 Filed: 02/04/2020 Page 2 of 3

Issued under my hand and the seal of said Court, this the \_\_\_\_ day of February, 2020.

ZACK WALLACE, CIRCUIT CLERK

HINDS COUNTY, MISSISSIPPI

BY:                     W                    , D.C.



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Case: 25CI1:20-cv-00079-WLK Document #: 8 Filed: 03/27/2020 Page 1 of 1  
 Case: 25CI1:20-cv-00079-WLK Document #: 3 Filed: 02/04/2020 Page 3 of 3

Hinds County, Mississippi

**PROOF OF SERVICE-SUMMONS**  
 (Process Server)

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used);

       FIRST CLASS MAIL AND ACKNOWLEDGMENT OF SERVICE. By mailing (by first class mail, postage prepaid), on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender (*Attach completed acknowledgment of receipt pursuant to M.R.C.P. Form 1B*).

       PERSONAL SERVICE. I personally delivered copies to Robert Graham on the 19 day of April, 2020, where I found said person(s) in Hinds County of the State of Mississippi.

       RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said person within        County, Mississippi. I served the summons and complaint on the        day of       , 2020, at the usual place of abode of said person by leaving a true copy of the summons and complaint with        who is the        (here insert wife, husband, son, daughter or other person as the case may be), a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the        day of       , 2020 I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

       CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (*Attach signed return receipt or the return envelope marked "Refused"*.)

At the time of service I was at least 18 years of age and not a party to this action.

FEE FOR SERVICE: \$       

Process server must list below:

Name Justin Thomas

Address 211 Reataylor St.  
Clinton, Ms. 39057

Telephone No. 669-226-1740

State of Mississippi-       

County of Hinds

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named Justin Thomas who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

        
 PROCESS SERVER SIGN HERE

Sworn to and subscribed before me, this the 20 day of March, 2020.

My Commission Expires: 04-18-2020

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Case: 25CI1:20-cv-00079-WLK Document #: 9 Filed: 04/07/2020 Page 1 of 1  
 Case: 25CI1:20-cv-00079-WLK Document #: 7 Filed: 02/04/2020 Page 3 of 3

Joel Williams

**PROOF OF SERVICE-SUMMONS**  
 (Process Server)

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used);

       FIRST CLASS MAIL AND ACKNOWLEDGMENT OF SERVICE. By mailing (by first class mail, postage prepaid), on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender (*Attach completed acknowledgment of receipt pursuant to M.R.C.P. Form 1B*).

       PERSONAL SERVICE. I personally delivered copies to JOEL WILLIAMS/JACKSON <sup>CAPTAIN</sup> on the 20 day of March, 2020, where I found said person(s) in Hinds County of the State of Mississippi.

       RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said person within        County, Mississippi. I served the summons and complaint on the        day of       , 2020, at the usual place of abode of said person by leaving a true copy of the summons and complaint with        who is the        (here insert wife, husband, son, daughter or other person as the case may be), a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the        day of       , 2020 I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

       CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (*Attach signed return receipt or the return envelope marked "Refused".*)

At the time of service I was at least 18 years of age and not a party to this action.

FEE FOR SERVICE: \$       

Process server must list below:

Name Beverly C. Thomas

Address 211 Rectory St.

Clinton, MS. 39056

Telephone No. 768-226-1740

State of Mississippi

County of Hinds

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named        who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

Beverly C. Thomas  
 PROCESS SERVER SIGN HERE

Sworn to and subscribed before me, this the 20 day of March, 2020.

Beverly C. Thomas  
 NOTARY PUBLIC

My Commission Expires: 04-18-2020

